



**IN THE UNITED STATES
PATENT AND TRADEMARK OFFICE**

PATENT APPLICATION

Inventors:	Richard B. Keller	Case:	012.P53003
Serial No.:	09/836,970	Filed:	04/17/2001
Examiner:	Kevin D. Mew	Group Art Unit:	2616
Confirmation No:	8488		
Title:	UTILIZING AVAILABLE SONET OVERHEAD BYTES FOR ADDITIONAL SIGNALING CHANNELS		

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Dear Sir:

In response to the Notice of Allowance and Examiner's statement of reasons of allowance mailed on April 20, 2006, it is respectfully requested that the following comments be entered in the record of the above-referenced patent application.

COMMENTS

The Examiner's statements of reasons for allowance are hereby acknowledged by Assignee. Assignee agrees that the claimed subject matter is patentably distinct from the documents cited by the Examiner. However, Assignee takes no position regarding the reasons for allowance presented by the Examiner, other than the positions Assignee may have previously taken during prosecution of the above-referenced patent application. Therefore, the Examiner's reasons for allowance should not be attributed to Assignee as an indication of the basis for Assignee's belief that the claims are patentably distinct. Furthermore, it is respectfully asserted that there may also be additional reasons for patentability of the claimed subject matter not explicitly stated in this record. While, in accordance with 37 C.F.R. §1.104(e), a failure by the Assignee to disagree with the Examiner or file more detailed comments does not give rise to any implication that the Assignee agrees with or acquiesces in the reasoning of the Examiner, here, by this document, Assignee is expressly making clear that no such agreement or acquiescence is present.

Respectfully submitted,

Dated: July 20, 2006

Gregory C. Ranieri
Gregory C. Ranieri
Registration No. 29,695
Attorney for Assignee

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To: Mail Stop Issue Fee

From: Ilka Dalton for Gregory C. Rani

7-20-06 1:24pm p. 1 of 5

Please find attached for filing in connection with application no. 09/836,970, entitled UTILIZING AVAILABLE SONET OVERHEAD BYTES FOR ADDITIONAL SIGNALING CHANNELS, the following documents:



Issue Fee Form PTOL85B (1 page)

Comments on Statement of Reasons for Allowance (2 pages)

Ilka Dalton

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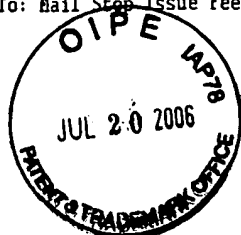
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To:	Mail Stop Issue Fee	From:	Gregory Ranieri
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Phone:		Date:	July 20, 2006
Our Ref:	012.P53003	CC:	

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- Issue Fee Form PTOL85B (1 page)
- Comments on Statement of Reasons for Allowance (2 pages)

CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being transmitted by facsimile to the U.S. Patent and Trademark Office on:

July 20, 2006

Date of Transmission

Ilka Dalton

Name of Person Transmitting Correspondence

Signature